

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF WISCONSIN
MILWAUKEE DIVISION**

ANDREW L. COLBORN,

Plaintiff,

vs.

**NETFLIX, INC.; CHROME MEDIA
LLC, F/K/A SYNTHESIS FILMS, LLC;
LAURA RICCIARDI; AND MOIRA
DEMOS,**

Defendants.

Civil No.: 19-CV-484-BHL

**DEFENDANT NETFLIX, INC.'S RESPONSE TO
PLAINTIFF'S MOTION TO TEMPORARILY RESTRICT**

Pursuant to General Local Rule 79(d)(3), Defendant Netflix, Inc. ("Netflix") submits this Response to Plaintiff Andrew Colborn's Motion to Temporarily Restrict (Dkt. 322) and states as follows:

1. On November 4, 2022, Plaintiff filed his opposition to Netflix's Motion for Summary Judgment and documents related thereto.
2. Because Plaintiff did not request to meet and confer with Netflix prior to filing his papers, Netflix had no earlier opportunity to consider whether any of the documents Plaintiff intended to file in connection therewith should be filed under restricted status.
3. Now having had the opportunity, Netflix has no objection to the following documents being filed publicly and without redactions:
 - a. Plaintiff's Brief In Opposition To Defendants' Motions for Summary Judgment (Dkt. 327);

- b. Plaintiff's Additional Proposed Findings of Fact (Dkt. 325);¹
 - c. The excerpted pages of the licensing agreement attached as an exhibit to the Declaration of April Rockstead Barker (Dkt. 330-22); or
4. Netflix takes no position on whether any other documents filed by Plaintiff in connection with his opposition to either Netflix's or the Producer Defendants' Motions for Summary Judgment should be filed under restriction or with redactions.

Dated: November 14, 2022

Respectfully submitted,

s/ Leita Walker

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¹ Although in his Motion to Restrict, Plaintiff represents that his Additional Proposed Findings of Fact (Dkt. 325) either contains redactions and/or is currently filed under restriction, neither is correct: that docket entry is currently accessible to the public, and the public version contains no redactions. Regardless, Netflix has no objection to it remaining that way.

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